

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION**

**UNITED STATES OF AMERICA**  
**Plaintiff,**

**v.**

**EDELIEL ESANULSANCHEZ**  
**RAINEY**  
**Defendant.**

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**NO. 2:24cr83**

<b>MOTION TO WITHDRAW</b>
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COMES NOW Antoinette N. Harris, retained counsel of record for Defendant Ediel Esanulsanchez Rainey, and respectfully moves this Honorable Court for leave to withdraw as counsel of record pursuant to Local Rule 57.12 and in accordance with the Sixth Amendment's guarantee of effective assistance of counsel.

In support of this motion, undersigned counsel states as follows:

Counsel was privately retained for a clearly defined, limited purpose—to represent Mr. Rainey during the pretrial phase, encompassing motion practice and plea negotiations. This representation has concluded with Mr. Rainey's voluntary and knowing entry of a guilty plea.

Mr. Rainey is now indigent, unable to retain substitute counsel for sentencing or post-plea matters. He has submitted documentation supporting a judicial determination of indigency.

Mr. Rainey's prior public defender, Attorney Eric Coats, possesses intimate familiarity with this case, having met with Mr. Rainey on multiple occasions. His reappointment would ensure continuity, preserve judicial economy, and respect the defendant's constitutional rights.

Continued representation under these conditions—beyond the original scope and without compensation—raises serious concerns of professional ethics and infringes upon the defendant's right to effective and unconflicted legal counsel.

This motion is not brought for delay, but rather to uphold the integrity of these proceedings, protect Mr. Rainey's constitutional rights, and allow for the prompt appointment of qualified counsel for sentencing.

To compel undersigned counsel to proceed further under these circumstances would undermine the interests of justice and due process.

WHEREFORE, Antoinette N. Harris respectfully requests that this Court:

- a. Grant withdraw as counsel of record for Mr. Rainey;
- b. Direct the Federal Public Defender's Office or, in the alternative, appoint a qualified CJA Panel attorney to represent Mr. Rainey in all remaining proceedings.

**[SIGNATURE BLOCK ON NEXT PAGE]**

Respectfully submitted,

**The Law Office of Antoinette N. Harris, PLLC**



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**Antoinette N. Harris**

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***Attorney for Ediel Esanulsanchaze Rainey***



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**Ediel Esanulsanchaze Rainey**

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 47.1(b), I, Antoinette N. Harris, certify that on April 22, 2025, I conferred via email with AUSA Jeff Haag and AUSA Anna Bell regarding the Motion to Withdraw. The Government takes no position the filing of the aforementioned Motion.



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**Antoinette N. Harris**

**CERTIFICATE OF SERVICE**


I hereby certify that on May 14, 2025, a true and correct copy of the foregoing was served via electronic mail and CM/ECF to:

**Jeff Haag**

Assistant United States Attorney  
West Texas Branch Chief  
Northern District of Texas, Amarillo Division  
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**Antoinette N. Harris**